



INFINITE POSSIBILITIES.  
ONE FAMILY.

## **SPEAKING UP POLICY**

### **Policy Description**

This policy applies to Rich Products Corporation and each of its subsidiaries and its associates, officers, directors and certain contractors and consultants. We are all responsible for being familiar with the Code of Responsible Business Practices (the "Code"), seeking guidance, and raising concerns. Rich's takes allegations of observed or suspected violations of company policy seriously and conducts prompt investigations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers, and associates to comply with the Code and to report violations or suspected violations in accordance with this Speaking Up Policy.

### **Anti-Retaliation**

Rich's will not tolerate retaliation against anyone for raising concerns in good faith regarding an actual or suspected violation of our Code, Company policy, or the law. Anyone engaging in retaliation against an associate who reports misconduct is in violation of the Code and may face disciplinary action, up to and including termination.

### **Reporting Procedure**

1. Rich's policy suggests that associates share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an associate's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to pursue one of the other following channels:

- Anyone else in management whom you are comfortable approaching
- The AEN
- The Vice President of Compliance
- Legal

2. You may also report a complaint on a confidential and anonymous basis by using the company's Ethics Hotline.

Ethics Hotline Website: <https://dowhatsright.rich.com>

Ethics Hotline Call Center: 1-800-461-9330 (North America)

We will exercise discretion to avoid disclosing the sources of information we receive.



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### **Accounting and Audit Committee Reporting**

The Audit Committee of the Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Vice President of Compliance shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

### **Receipt and Treatment of Complaint**

The Vice President of Compliance will notify the sender and acknowledge receipt of the reported violation. Reports of suspected misconduct will be appropriately investigated and treated confidentially to the extent possible in light of Rich's need to conduct an investigation and follow up on any concerns.

We treat all parties involved in an investigation--including subjects, reporters and witnesses-- fairly and respectfully, and we let the facts produced by the investigation determine what if any remediation steps should be taken.

### **Retention of Records**

Creating and maintaining accurate and complete data is essential for our ability to meet our business needs as well as legal and regulatory requirements. We retain business records in accordance with the law, to the extent needed for business purposes, or longer if required by tax, works council agreements, regulatory, or other standards.